Stephen Gehringer Esquire Law Offices of Bruce Shaw, P.C. May 30, 2024

This Expert Topics and Conclusions report has been prepared by an independent, unbiased, subject matter expert and author, for Mr. Dale R. Wilkinson concerning his original authentic 1962 Corvette Serial Number **20867S111261** with 63,375 miles. This report contrasts the differences between Dale's original authentic 1962 Corvette and a nearly identical counterfeit clone constructed in approximately 1997-1999 and currently owned by Howard Andrews in Montgomery, Texas.

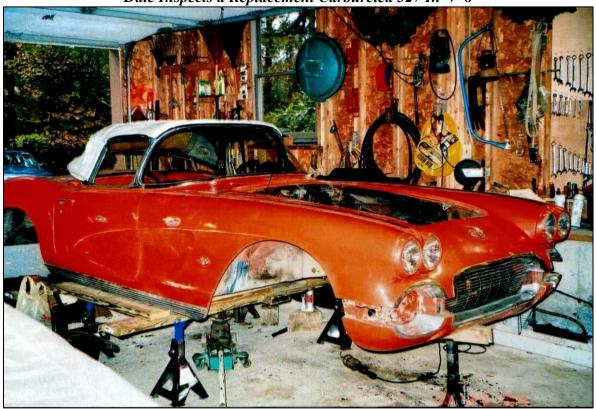


Dale Wilkinson's Original Authentic 1962 Corvette 20867S111261 "Glamour Shot" After His 2010 Restoration

Dale Wilkinson purchased the local Peabody, MA 1962 Corvette on January 4, 2006, from Bruce G. Brown. Dale requested copies of an unusual three men's simultaneous round-robin title transfers on October 15, 2000, (Ref. Page 14). After Dale purchased the 1962 Corvette for \$16,000 and received Bruce Brown's MA title AV510567 (Ref. Page 15). Massachusetts required Dale to pay sales tax on its estimated \$26,000 value. Dale wished to study his Corvette for clues to its originality. The only specifications Dale, as a layperson, discerned from the 56,256-mile Corvette he purchased on 1-4-2006 were (1) Fawn Beige exterior paint, (2) white convertible top, (3) AM Radio, (4) factory hardtop, (5) positraction axle, (6) Fawn Beige interior color, (7) Fuel Injection V-8 engine and four-speed transmission based on holes in the fiberglass engine compartment where Fuel Injection components such as the air cleaner and emblems were originally mounted. Dale had every confidence that his 1962 Corvette Serial Number 20867S111261's subsequent Massachusetts Title BC797188 dated 1-4-2006 was fully legal and legitimate and he began to plan the restoration of his vehicle.



Dale Inspects a Replacement Carbureted 327 In³ V-8



Dale's 1962 Corvette 20867S111261 Body on Jack Stands ~ The "Fuel Injection" Side Fender Emblem Holes were Filled In Before Re-painting it Red



Dale's Original White Soft Top and the Hardtop's Rear Deck Mounting Bezels & St. Louis Body Shop Green Lumber Crayon Confirms FAWN (Paint)& HT (Hardtop)





Dale's 1962 Corvette Chassis Shows the Expected 56,000 Miles Wear and Tear Frame and Chassis Components Mostly Devoid of Factory Asphalt Based Chassis Coating



Dale's Original Authentic Steering Column Serial Number Tag Close-up B&W Photo

Dale Wilkinson did not register his 1962 Corvette for license plates because it would be off the road for restoration. Dale painstakingly photographed the asfound current condition, quite normal for such an undertaking. In October 2006 Dale Wilkinson began the disassembly of his original authentic 1962 Corvette Serial Number 20867S111261.

One of Dale's first discoveries was the poorly attached Serial Number Tag welds to the steering column housing. The upper weld was completely loose.



Blowup of Dale's Authentic Original Authentic B&W Steering Column Photo

Dale masked off the Serial Number tag and bead blasted the steering column and then had it riveted at both ends while still in place. The Serial Number Tag was never completely removed, and it has remained unmolested since 1962.

Expert Topic #1 Authenticating Dale Wilkinson's 1962 Corvette 20867S111261 "Serial Number Tag"



Mr. Dale Wilkinson's Original Authentic 1962 Corvette Steering Column Serial Number Tag Albeit Riveted

Metal Material: Stainless Steel, Grade Unknown with Low Formability

Attachment Method: Resistance Welding, Two End Locations

Riveted by Dale in 2006

Alpha Characters: Upper Case CHEVROLET, is a Match with Known

Repeatable Font

Numeric Characters: Graphotype, is a Match with Known Repeatable Font

Shifted Slightly Right of CHEVROLET

Patina: In Accordance with 60 years Inside the Engine

Compartment Heat and Fluids Environment

In 2022, Dale Wilkinson learned of a counterfeit 1962 Corvette in Howard Andrew's possession who purchased it at a Mecum Auction on September 7-10, 2022 in Dallas, Texas, Lot #S108.1. Howard Andrews furnished a photograph of his Serial Number Tag **20867S111261** to Dale.



Howard Andrew's Counterfeit Reproduction 1962 Corvette, Photo e-mailed by Andrews to Wilkinson in 2022, Discrepancies in Red

Metal Material: Aluminum, Grade Unknown with High Formability

Attachment Method: Unknown Reverse Side Bonding Type Unknown

Simulated Welding Circular Targets

Alpha Characters: **Do Not Match with the** Known Upper Case Font

Distinct Variations in C, H, E, V, R, & O Letters

Numeric Characters: Graphotype, Closely Matchs Known Repeatable Font

Except Shorter than CHEVROLET

Patina: Less Than Accordance with 60 years Inside Engine

Compartment Heat and Fluids Environment



Howard Andrew's Next in Sequence 1962 Corvette Serial Number Tag Photo e-mailed by Andrews to Wilkinson in 2022

Howard Andrews' grainy photograph of **20867S111262** appears to be an original authentic 1962 Corvette SN Tag.

Metal Material: Stainless Steel, Grade Unknown with Low Formability

Attachment Method: Resistance Welding, Two End Locations

Alpha Characters: Upper Case CHEVROLET, is a Match with Known

Repeatable Font

Numeric Characters: Graphotype, is a Match with Known Repeatable Font

The Serial Number Tag installed on the Andrews' vehicle is a counterfeit reproduction. The method to detect such counterfeits is the same as a numismatist's detection of counterfeit coins by analysis of the metal composition and magnification of the mechanically stamped features versus known validated originals. I compared the Andrews Serial Number Tag to several known original authentic tags and the discrepancies become clear (Ref. Separate Appendix I).



1962 Corvette Authentic Original CHEVROLET Embossed Font



Andrews' Counterfeit CHEVROLET Font with Critical Differences Highlighted by Red Markers

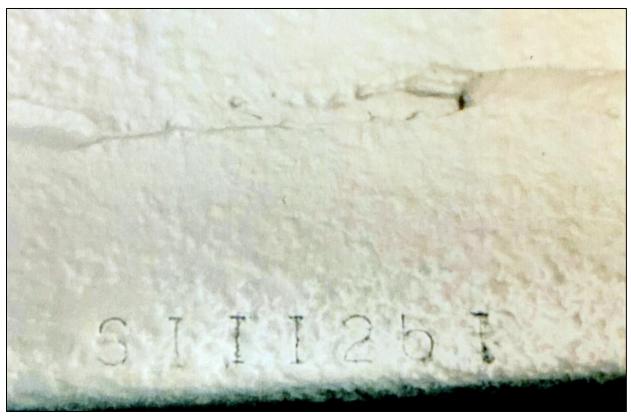
On Howard Andrews' 1962 Corvette Serial Number Tag, in **CHEVROLET**, the **C**, **H**, **E**, **V**, **R**, and **O** are not factory typical. Specifically, Howard Andrews' opening in the **C** is too large. HA's **H** is too narrow with radiused inside corners instead of right-angle corners. HA's centerline of the **E** should be above the center and not on the dead center. HA's inside crevice of the **V** should be deep and sharply defined. HA's **R** is too narrow and the upper opening should be shaped like a D with right-angle corners and a long leg. HA's opening of the **O** should be oval where it is much taller than wide.

EXPERT CONCLUSION #1 Dale Wilkinson's 1962 Corvette 20867S111261 Serial Number Tag is the authentic original because of its aspects and its overall environment.

The material type, method of attachment, alpha characters, numeric characters, and overall spacing match many other known 1962 Corvette examples and it displays an appropriately aged patina. Howard Andrew's Serial Number Tag is an aluminum counterfeit with a non-typical factory CHEVROLET font and without proper welds.

Expert Topic #2 Authenticating Dale Wilkinson's 1962 Corvette 20867S111261 "Stamped Frame Serial Number"

During Dale's 1962 Serial Number **20867S111261** Corvette restoration in 2007, he thoroughly cleaned the frame to bare metal. The frame's surface was pock-marked from rust however the St. Louis Corvette Assembly Plant's original authentic stamped chassis number **SIII26I** was still quite pristine.



Dale's Original 1962 Corvette Frame Rail Serial Number SIII26I

Dale Wilkinson furnished a photograph of his 1962 Corvette Serial Number **20867S111261** frame stamping **FIII26I** to Howard Andrews shown above. Evaluation of the Wilkinson 1962 Corvette "Authentic Original" Corvette Serial Number **SIII261** "Frame Stamping" versus other 1962 Corvette "Authentic Originals" ideally requires a metal composition and magnification of the mechanically stamped features similar to the Serial Number tags. However, this endeavor is cumbersome and difficult for several reasons.

- 1. Corvette owner photographs of Serial Number frame derivative stampings obtained during a body-off restoration are very closely guarded and rarely shared to maintain privacy. Photographs are usually only offered contingent upon a vehicle's sale.
- 2. Chevrolet St. Louis deliberately stamped the Serial Number derivative on the top side of the frame rail to make verification difficult but ultimately doable by law enforcement. Its location is virtually impossible to judge on a show field or to be seen even when the vehicle is supported on an overhead lift, and therefore it is exempt from NCRS and Bloomington Gold judging.
- 3. The Serial Number derivative frame stamping is usually the first item checked when a body-off restoration is conducted.



A Believed Authentic 1958 Corvette Frame Stamp S102016 Only Wire Brushed for Clarity

Fortunately, despite the lack of multiple direct comparison photos, the originality and authenticity of the Wilkinson 1962 Corvette SIII26I stamped frame serial number matches 100% with the above 1958 sample's characters. The Wilkinson frame stamp's originality can also be determined from the totality of other conditions surrounding it, namely its typical prolonged life in a damp northern environment such as Connecticut and Massachusetts with many freeze-and-thaw cycles leaving a ruddy pockmarked surface. The St. Louis stamped characters originally embedded in virgin steel in 1962, gradually became weathered and pockmarked over time equally with the surrounding steel. Such an environmentally conditioned surface cannot be mechanically altered or duplicated without leaving tell-tale evidence.

In my engineering and management capacity at Chevrolet and General Motors between 1968 and 2008, I saw Chevrolet Engineering product identification microfilm documents many years ago that were still relevant and compulsory at the time. The letter "I" was often specified in place of the number one and the straight leg six and nine were also one of the recommended typical variations. In certain special instances, the letter "O" and the number zero were skipped to avoid misidentification. Serial Numbers required the number zero however the letter "O" was avoided in serial numbers until the backslash-zero Ø became common, first practiced on crude dot matrix computer printers. Outside of General Motors, much of this practice is virtually unknown. Florida law enforcement officials previously concurred with the Wilkinson 1962 Corvette frame stamping SIII26I originality and authenticity (Ref. Page 18).

EXPERT CONCLUSION #2 The Wilkinson SIII26I frame stamping is original and authentic because it is in the correct location on the frame. It is the correct font. The letter I for the number 1 is correct, as is the straight leg number six. There is no indication of peening, filling, or otherwise concealing and restamping. There is no indication of removing a section of the frame, welding in replacement steel, and restamping. All of these known illicit alterations can also be detected forensically. Howard Andrew's frame stamping is unknown and requires closeup unencumbered expert visual inspection.

Expert Topic #3 Authenticating Dale Wilkinson's 1962 Corvette 20867S111261 Using Chevrolet Shipping Report Via the NCRS

Chevrolet Motor Division located a shipping information report for 1961 through 1975 Corvettes and provided the database to the NCRS in 2010 as a fundraising program/service. The NCRS charges a significant but reasonable fee for the service and issues an official report for the given requested VIN with the NCRS Judging Chairman's signature and an affixed NCRS gold foil label.

Dale Wilkinson ordered the NCRS SHIPPING DATA REPORT for his 1962 Corvette **20867S111261** and received it dated December 7, 2011 (Ref. Page 16). The NCRS report verifies Dale's 1962 Corvette was shipped to Dealer #43 W. R. Austin Chevrolet in South Norwalk CT Zone #2 and therefore it is virtually certain Dale's Corvette never left the New England region from 1962 to 2020.

Whereas the counterfeit 1962 Corvette **20867S111261** which is currently owned by Howard Andrews; the NCRS judging information supplied by Roy M. Johnson circa 2000 before Chevrolet's circa 2010 database was discovered states the Corvette was delivered new to Jimmy Lewis Chevrolet.

I witnessed the original Chevrolet database in Detroit several years ago and I am familiar with its format. There are six pieces of data listed for each Corvette Serial Number (a.k.a. VIN). The NCRS validation service only lists four pieces of data because the two omitted pieces are obscure information relative only to why the database was created and the omitted data are irrelevant to current Corvette owners. Dale's title searches in CT and MA before Steven Alderin's ownership are still in process.

The earliest known Hpward Andrew's counterfeit 1962 Corvette **20867S111261** title is from Oklahoma #6017892640002 (Ref Page 17) with an odometer reading of 0 miles. There was no seller identity recorded on its transfer to Johnson Chev Buic Olds Pont, PO Box 737 Clarksville AR 72830, on December 8, 2000, receiving Arkansas title #999400B8365

EXPERT CONCLUSION #3 The Wilkinson 20867S111261 Corvette Dealer #43 W. R. Austin Chevrolet in South Norwalk CT Zone #2 is authentic and correct. Howard Andrew's information is therefore deemed invalid.

Expert Topic #4 Authenticating Dale Wilkinson's 1962 Corvette 20867S111261 "Actual Recorded Odometer Miles"

Currently, the earliest known actual recorded odometer mileage for the Wilkinson 1962 Corvette **20867S111261** is on October 15, 2000, Massachusetts Title **AV510567** at 56,256 when Bruce G. Brown purchased the car (Ref page 14).

Dale Wilkinsin's original AC Tachometer installed at St. Louis for its RPO-582 Fuel Injection V-8 engine specified a "Zero to 70" range (0-7,000) with a 6,500 RPM Red-Line and a background Yellow Line Normal Operating Range starting at "10" (1,000 rpm). Dale's 6,500 RPM "Red Sweep" had appropriately faded with age from bright red to orange-red when it was at 62.008.1 miles.

Howard Andrew's counterfeit reproduction AC Tachometer for an RPO-582 Fuel Injection V-8 engine has a brilliant reproduction silk-screened AC Tachometer face with a bright red 6,500 RPM Red-Line.

Per Florida's DMV affidavit on November 11, 2023, the certified odometer mileage on the Wilkinson 1962 Corvette **20867S111261** was recorded as 61,375 Actual Miles by Florida Trooper Chris Morton who also witnessed the Frame Stamping photographs as a secondary VIN and he performed an NCIB check (Ref. Page 18).



Dale Wilkinson's 1962 Corvette 20867S111261 Odometer at 62008.1 Miles



Howard Andrews' Counterfeit 1962 Corvette 20867S111261 Odometer at 1283.3 Miles Photo Courtesy of Fort Lauderdale Collections Circa May 2022

EXPERT CONCLUSION #4 The 1962 Wilkinson 20867S111261 Corvette Speedometer and Odometer mileage are authentic and true. Howard Andrew's Corvette Oklahoma origination story in or around 2000 at 0 miles is counterfeit.

I am pleased to provide the aforementioned four Expert Topics and Expert Conclusions for Mr. Dale Wilkinson's 1962 Corvette 20867S111261 and pronounce it original and authentic in all four significant respects. I further attest that Mr. Howard Andrew's 1962 Corvette and its current documentation are counterfeit.

May 30, 2024

Date

Kenneth W. Kayser

Kayser Specialty Co.

Reference Separate Expert Resume

Kennets W. Kayper

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Bruce G. Brown's 1962 Corvette 20867S111261 MA Title AV510567 Dated 2-9-2001 Odometer Reading 56,256





SHIPPING DATA REPORT

Subject to the General Conditions listed on the reverse side, National Corvette Restorers Society, Inc. confirms the following information exists in the GM shipping data records for the 1962 Corvette with vehicle identification number 20867S111261.

The GM official Production Date was 5/15/1962

The original delivery dealer was Dealer code 43 in zone 2.

The name and Address for the Dealer was:

W.R. Austin Chevrolet South Norwalk, CT

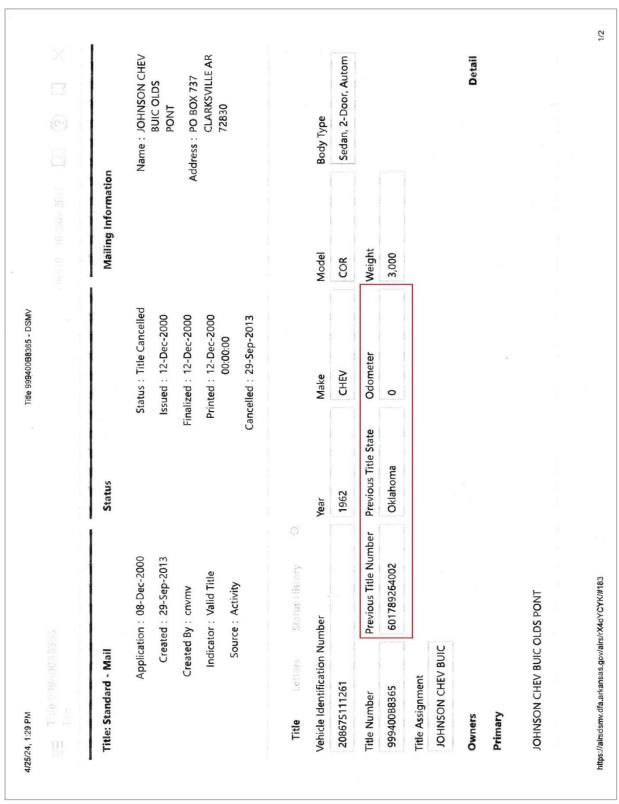
Thank you for using the NCRS Historic Document Services.

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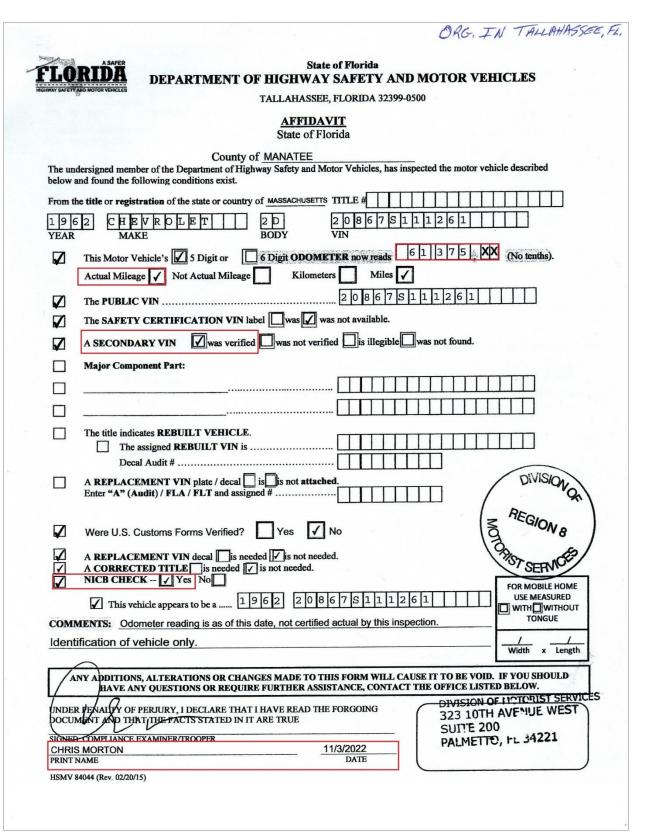
NCRS National Judging Chairman

December 7, 2011





Evidence of Howard Andrews's Counterfeit 1962 Corvette 20867S111161 Oklahoma #601789264002 Title and "0" Miles



Dale Wilkinson ~ 11-03-2022 ~ 61,375 Actual Miles ~ Signed by Chris Morton Certified Florida Report for Serial Number Tag and Frame Serial Number